

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON WAVE 3 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF ETHICON'S MOTION TO EXCLUDE THE  
OPINIONS AND TESTIMONY OF VLADIMIR IAKOVLEV, M.D. FILED IN  
WAVE 1**

Defendants Ethicon, Inc., Ethicon LLC, and Johnson & Johnson ("Ethicon") hereby adopt and incorporate by reference Ethicon's Motion to Exclude the Opinions and Testimony of Vladimir Iakovlev, M.D. [Dkt. #2066], and Ethicon's Memorandum of Law in Support of Motion to Exclude the Opinions and Testimony of Vladimir Iakovlev, M.D. [Dkt. #2070], previously filed in Wave 1. Ethicon respectfully requests that the Court exclude Dr. Iakovlev's testimony in the Wave 3 cases identified in Exhibit A, attached hereto, for the reasons expressed in the Wave 1 briefing adopted and incorporated herein.

Dated: September 19, 2016

Respectfully submitted,

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
(304) 414-1807  
dthomas@tcspllc.com

/s/ Christy D. Jones

Christy D. Jones  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4523  
christy.jones@butlersnow.com

COUNSEL FOR DEFENDANTS  
ETHICON, INC., ETHICON LLC, AND  
JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)

Thomas Combs & Spann, PLLC

300 Summers Street, Suite 1380

P.O. Box 3824

Charleston, WV 25338-3824

(304) 414-1800

dthomas@tcspllc.com